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Attorneys for the Reorganized Debtors

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION,

- and -

PACIFIC GAS AND ELECTRIC COMPANY.

Reorganized Debtors.

- Affects PG&E Corporation
- Affects Pacific Gas and Electric Company
- Affects both Debtors

** All papers shall be filed in the Lead Case, No. 19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**DECLARATION OF ELISA NADEAU IN
SUPPORT OF REORGANIZED DEBTORS'
OPPOSITION TO MOTION FOR RELIEF
FROM ORDER OF SPIRO JANNINGS**

Related to Docket Nos.: 11829 and 11871

Hearing Information:

Date: March 2, 2022

Time: 10:00 a.m. (Pacific Time)

Time: 10:30 a.m. (Pacific Time)
Place: (Tele/Videoconference Appearances Only)
United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

1 I, Elisa Nadeau, pursuant to section 1746 of title 28 of the United States Code, hereby declare
2 under penalty of perjury that the following is true and correct to the best of my knowledge, information,
3 and belief:

4 1. I am the attorney of record for Defendant Pacific Gas and Electric Company (the
5 “**Utility**”) in the civil case pending before the Santa Clara County Superior Court, *Jannings v. Pacific*
6 *Gas and Electric Company, erroneously sued as “Pacific Gas & Electric”*, Case No. 17CV315033, (the
7 “**State Court Action**”) and have represented the Utility since its first appearance in that matter. I have
8 personal knowledge of the facts set forth herein and, if called as a witness, could and would competently
9 testify thereto. I submit this Declaration in support of the *Reorganized Debtors’ Opposition to Motion*
10 *for Relief from Order of Spiro Jannings* (the “**Opposition**”),¹ filed contemporaneously herewith.

11 2. Attached hereto as **Exhibit A** is a true and correct copy of an April 23, 2018 e-mail that
12 I, as counsel for the Utility in the State Court Action, sent to Spiro Jannings, who at that time was
13 proceeding *pro se* in the State Court Action.

14 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and
15 correct to the best of my knowledge, information, and belief. Executed this sixteenth day of February,
16 2022, in San Jose, California.

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21 Elisa Nadeau
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28 ¹ Capitalized terms used but not otherwise defined herein have the meanings ascribed to such terms in
the Opposition.